

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 **Marquis Aurbach Coffing**
CRAIG R. ANDERSON, ESQ.
2 Nevada Bar No. 6882
JOSHUA L. BENSON, ESQ.
3 Nevada Bar No. 10514
10001 Park Run Drive
4 Las Vegas, Nevada 89145
Telephone: (702) 382-0711
5 Facsimile: (702) 382-5816
canderson@maclaw.com
6 jbenson@maclaw.com
Attorneys for Defendants LVMPD
7 and Kevin G. Conaway

8 **UNITED STATES DISTRICT COURT**

9 **STATE OF NEVADA**

10 KARLA IVY KLEIN,

11 Plaintiff,

Case No: 2:13-cv-00359-GMN-VCF

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a Political Subdivision of the
14 State of Nevada; Police Officer Kevin G.
Conaway (LVMPD #8402) individually and as
15 Police Officer, employed by the LAS VEGAS
METROPOLITAN POLICE DEPARTMENT;
16 Police Officers John Does 1-10; John Does 11-
20; Roe Corporations 1-10, inclusive,

17 Defendants.
18

19 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**
20 **(FIRST REQUEST)**

21 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of
22 record, hereby stipulate and request that this Court extend discovery in the above-captioned case
23 to February 28, 2014. In addition, the parties request that the dispositive motions deadlines be
24 extended to March 31, 2014. In support of this Stipulation and request, the parties state as
25 follows:
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I. DISCOVERY AND FILINGS COMPLETED TO DATE.

The parties have completed the majority of discovery—including written discovery, disclosure of experts and some depositions:

1. On April 17, 2013, Plaintiff served her initial disclosure.
2. On April 25, 2013, Defendants served their initial disclosure.
3. On September 30, 2013, Defendants served their first supplement to initial disclosure.
4. On October 9, 2013, Plaintiff served her first supplement to initial disclosure.
5. On October 31, 2013, Defendants served their second supplement to initial disclosure.
6. On November 13, 2013, Defendants served their third supplement to initial disclosure.
7. On November 27, 2013, Defendants served their fourth supplement to initial disclosure.
8. On December 4, 2013, Defendants served their fifth supplement to initial disclosure.

II. DISCOVERY THAT REMAINS TO BE COMPLETED.

The depositions of Officer Conaway, Jackie Kassower and LVMPD 30(b)(6) witness still remain to be taken. Plaintiff and Defendants respectfully request an extension of the discovery deadlines and dispositive motions deadline based upon the parties attempting to reach a settlement.

III. REASONS DISCOVERY REMAINING WAS NOT COMPLETED.

The parties seek approximately a 60-day extension of the discovery deadlines and the dispositive motions deadline due to the parties actively attempting to settle this matter. Prior to close of discovery the parties properly noticed the depositions of Officer Conaway, Jackie Kassower and LVMPD 30(b)(6) witness. Based upon settlement negotiations the parties agreed to continue these depositions and now request a 60-day extension to complete settlement discussions and take the depositions, if necessary. This additional time will permit the parties to

conduct additional discovery in the event a settlement is not reached. Plaintiffs and Defendants have been diligent in complying with the current scheduling deadlines.

IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY.

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-Off	December 30, 2013	February 28, 2014
Dispositive Motions	January 30, 2013	March 31, 2014

DATED this 30th day of January, 2014.

DATED this 30th day of January, 2014.

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YAN KENYON

By: /s/ Joshua L. Benson, Bar No. 10514

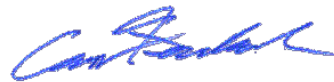
By: /s/ Jay A. Kenyon, Bar No. 6376

Craig Anderson, Esq.
Nevada Bar No. 6882
Joshua L. Benson, Esq.
Nevada Bar No. 10514
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Plaintiff LVMPD

Jay A. Kenyon, Esq.
Yan Kenyon
7881 W. Charleston Blvd., Suite 165
Las Vegas, Nevada 89117
Attorneys for Plaintiff

ORDER

IT IS SO ORDERED this 3rd day of February, 2014.



~~UNITED STATES DISTRICT COURT JUDGE~~

Magistrate

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